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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL JACOBS,  
Plaintiff,

vs.

GEICO GENERAL INSURANCE COMPANY;  
DOES I through X, inclusive; ROE  
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: 2:19-cv-01934-APG-EJY

**STIPULATION TO EXTEND TIME TO  
OPPOSE DEFENDANT'S MOTION TO  
DISMISS, OR IN THE ALTERNATIVE,  
TO SEVER/BIFURCATE AND TO  
STAY CLAIMS FOR BAD FAITH**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff MICHAEL JACOBS, by and through his attorneys of record L. DIPaul MARRERO II, ESQ. and ROBERT D. VANNAH, ESQ., of VANNAH & VANNAH, and Defendant GEICO GENERAL INSURANCE COMPANY, by and through its attorneys of record WADE M. HANSARD, ESQ., JONATHAN W. CARLSON, ESQ., and RENEE M. MAXFIELD, ESQ., of MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, that Plaintiff MICHAEL JACOBS be granted an extension of time in which to file a response to Defendant GEICO GENERAL INSURANCE COMPANY's Motion to Dismiss, or in the Alternative, to Sever/Bifurcate and to Stay Claims for Bad Faith, which was filed on November 12, 2019. The parties stipulate to extending the time for Plaintiff's response to December 6, 2019. Plaintiff's counsel has a trial this month and will need to

devote considerable time and energy to it. This is the first stipulation for extension of time to file Plaintiff's response.

Dated: November 13, 2019

Vannah & Vannah

/s/ L. Dipaul Marrero II, ESQ

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Attorneys for Plaintiff Michael Jacobs

Dated: November 13, 2019

McCormick, Barstow, Sheppard, Wayte & Carruth LLP

/s/ Jonathan W. Carlson, ESQ

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RENEE M. MAXFIELD, ESQ.  
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Las Vegas, NV 89113  
Attorneys for Defendant Geico General Insurance Company

**ORDER**

IT IS SO ORDERED

DATED this 14th day of November 2019

  
UNITED STATES MAGISTRATE JUDGE